

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
NORTHERN DIVISION**

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

AIC, INC. et al.,

Defendants,

and

**ALLIED BEACON PARTNERS, INC. (f/k/a
Waterford Investor Services, Inc.) et al.,**

Relief Defendants.

No. 3:11-cv-00176

DECLARATION OF MICHAEL J. RINALDI

I, Michael J. Rinaldi, state, to the best of knowledge, information, and belief, that the attached exhibits to Plaintiff's Motion for Partial Summary Judgment are true and correct copies of the following:

EXHIBIT	DESCRIPTION
1	3/21 Deposition of Nicholas Skaltsounis (select pages)
2	Exhibits 7 & 10 to Deposition of Barbara Ivester; Exhibit 2 to 3/21 Deposition of Nicholas Skaltsounis; Exhibit 4 to Deposition of Della Tabar
3	Exhibit 12 to Deposition of Douglas Mussler
4	Expert Report of Timothy Hurley
5	4/10 Deposition of Nicholas Skaltsounis (select pages)
6	Deposition of John Guyette (select pages)
7	11/27 Deposition of Nicholas Skaltsounis (select pages)
8	Expert Report of Ray G. Stephens
9	Document Requests and Interrogatories Served by the Commission
10	3/22 Deposition of Nicholas Skaltsounis (select pages)
11	Exhibit 9 to 3/22 Deposition of AIC

EXHIBIT	DESCRIPTION
12	Deposition of Paula Collier (select pages)
13	Defendants and Relief Defendants' Supplemental Answers and Responses to Plaintiff's First Interrogatories and Requests for Production of Documents (select pages)
14	Interrogatory Verifications
15	Deposition of Douglas Mussler (select pages)
16	Defendants and Relief Defendants' Third Supplemental Answers and Responses to Plaintiff's First Interrogatories and Requests for Production of Documents (select pages)
17	Deposition of Della Tabar (select pages)
18	Deposition of Franklin Flannery (select pages)
19	Deposition of Cindy Freeland (select pages)
20	Deposition of Richard Landi (select pages)
21	Deposition of Roger Liebowitz (select pages)
22	Deposition of Barbara Ivester (select pages)
23	Deposition of Frank Wainscott (select pages)
24	Deposition of Christopher Pollina (select pages)
25	Defendants and Relief Defendants' Objections, Answers and Responses to Plaintiff's First Interrogatories and Requests for Production of Documents (select pages)
26	Deposition Notice for AIC
27	Deposition Notice for CB Securities
28	5/1 Deposition of Nicholas Skaltsounis (select pages)
29	4/29 Deposition of Nicholas Skaltsounis (select pages)
30	Exhibit 11 to 3/22 Deposition of AIC
31	Exhibit 13 to 3/22 Deposition of AIC
32	Deposition of Pamela Lewis (select pages)
33	Exhibits 15-20 to 4/29 Deposition of AIC
34	Exhibit 7 to Deposition of John Guyette
35	Deposition of Advent (select pages)
36	Deposition Notice for Advent
37	Deposition of Waterford (select pages)
38	Deposition Notice for Waterford
39	Deposition of CBS Advisors (select pages)
40	Deposition Notice for CBS Advisors

I, Michael J. Rinaldi, do hereby declare under penalty of perjury, in accordance with 28 U.S.C. § 1746, that the foregoing is true and correct.

Executed on the 24th day of May, 2013.

s/ Michael J. Rinaldi
Michael J. Rinaldi

CERTIFICATE OF SERVICE

I hereby certify, this twenty-fourth day of May, 2013, that I served a true and correct copy of the foregoing, by the means indicated, upon the following:

Heather G. Anderson, Esq.
Reeves, Herbert & Anderson, P.A.
Tyson Place, Suite 130
2607 Kingston Pike
Knoxville, Tenn. 37919
(by the Court's electronic filing system)

Steven S. Biss, Esq.
300 W. Main St., Ste. 102
Charlottesville, Va. 22903
(by the Court's electronic filing system)

Mr. John B. Guyette
2559 53rd Avenue
Greeley, Colo. 80634
(by first-class mail, postage prepaid)

Mr. John R. Graves
4300 W. Francisco Road, Unit 11
Pensacola, Fla. 32504
(by first-class mail, postage prepaid)

and

John Robert Graves, #79185-083
Oakdale FDC
P.O. Box 5010
Oakdale, La. 71463
(by first-class mail, postage prepaid)

s/ Michael J. Rinaldi
Michael J. Rinaldi